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MAR - 4 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

0429

March 4, 1996

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**VIA HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: PR Docket 92-235

Dear Mr. Caton:

In accordance with the requirements of Section 1.1208 of the Commission's Rules, this is to notify the Commission that the President, the Executive Vice President, and members of the Executive Committee of Forest Industries Telecommunications, accompanied by counsel, met with the following members of the Commission's staff and discussed several pending issues in the above-referenced rulemaking proceeding.

Those members were: Jackie Chorney, Legal Advisor to Chairman Hundt; David Siddall, Legal Advisor to Commissioner Ness; Suzanne Toller, Legal Advisor to Commissioner Chong; Ralph Haller, Deputy Chief, Wireless Telecommunications Bureau; Rosalind Allen, Associate Chief, Wireless Telecommunications Bureau; and Robert H. McNamara, Chief of the Wireless Radio Division, of the WTC.

The matter discussed are described in the enclosed document, titled Forest Industries Telecommunications. Copies of that document were given to the staff members involved.

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FLETCHER, HEALD & HILDRETH

Mr. William F. Caton

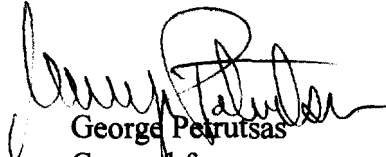
March 4, 1996

Page 2

Two copies of that document are enclosed. Please associate them with the Commission's files for the above-referenced rulemaking proceeding as an Ex Parte Presentation.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.

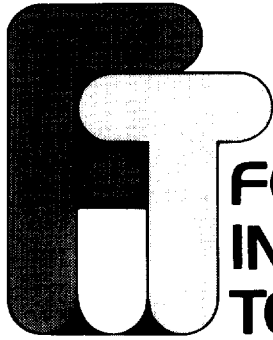
A handwritten signature in dark ink, appearing to read "George Petrutsas", is written over the typed name.

George Petrutsas  
Counsel for  
Forest Industries Telecommunications

GP:cej

Enclosures

cc: Jackie Chorney, Esquire (w/enc.)(VIA HAND DELIVERY)  
David Siddall, Esquire (w/enc.)(VIA HAND DELIVERY)  
Suzanne Toller, Esquire (w/enc.)(VIA HAND DELIVERY)  
Mr. Ralph A. Haller (w/enc.)(VIA HAND DELIVERY)  
Rosalind Allen, Esquire (w/enc.)(VIA HAND DELIVERY)  
Robert H. McNamara, Esquire (w/enc.)(VIA HAND DELIVERY)



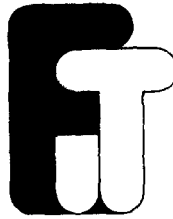
**FOREST  
INDUSTRIES  
TELECOMMUNICATIONS**

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FOREST TELECOMMUNICATIONS COMMISSION  
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# Forest Industries Telecommunications

## Private Land Mobile Radio Services

Frequency Coordination

Licensing Specialists

871 Country Club Road, Suite A  
Eugene, Oregon 97401

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E-mail:	fit@jb.com

# **FOREST PRODUCTS RADIO LICENSEES PROFILE**

FOREST PRODUCTS RADIO SERVICE licensees include small independent logging contractors, log truckers and companies engaged in related woods products activities as well as large fortune 500 forest products firms.

Weyerhaeuser

Champion International

Georgia Pacific Corporation

International Paper Company

Boise Cascade Corporation

and thousands of small independent loggers and log truckers.

The Forest Products Radio Service also includes companies that are engaged in the manufacturing of wood and finished wood products for commercial and consumer use, or pulp and paper manufacturing from cardboard liner to finished paper products.

Mead Corporation

Green Bay Packaging

Inland Container Corp.

James River Corporation

Appendix A: *Forest Products Radio Use* illustrates the areas of major concentration of Licensees in the Forest Products Radio Service.

# **RADIO COOPERATIVES AND ASSOCIATIONS**

Eligibility in the Forest Products Radio Service is also available to radio user cooperatives and associations. There are more of these in the Forest Products Radio Service than any other radio service. Co-ops and associations serve thousands of smaller forest products firms by providing two-way radio service to their members, thus reducing the cost to the user and making more efficient use of the valuable radio spectrum.

Associated Oregon Loggers

Washington Contract Loggers Association

Prairie Mountain Radio Cooperative

Willamette Radio Cooperative

Emerald Loggers Radio Association

Taylor County Loggers Communications

These cooperatives and associations build and maintain their two-way radio systems and offer the radio service as either their sole function or as part of a larger menu of membership services.

The FCC and FIT have historically encouraged the development of radio cooperatives and associations in order to make efficient use of the spectrum and help reduce the number of individual, small, or single user radio systems. Association, cooperative, shared user and community repeater systems may only be used by firms that are able to meet the eligibility requirements of the Forest Products Radio Service found in Section 90.67 a of the FCC Rules and Regulations.

## RADIOS IN ACTION

There is no "typical" use of two-way radio in the Forest Products Radio Service. However, the primary function is to assist with providing a safe working environment, promoting operational efficiency and coordinating the activities of thousands of pieces of heavy equipment, vehicles, personnel and production equipment each and every day.

Hand held portables:	Mills, manufacturing and pulp and paper plants, logging and reforestation job site communications.
Vehicular Mobiles:	Log trucking, coordination of logging activities, in mills and manufacturing for loaders, fork lifts and product delivery trucks.
Mobile Relays:	To extend the mobile-to-mobile communication range.
Fixed Relays:	To interconnect mobile relays.
Fixed Microwave:	To interconnect mobile relays, plant and office facilities.
Telemetry systems:	To provide control data and remote control functions of manufacturing plant activities, monitor weather conditions, equipment security.

Specialized radio systems have even been developed to meet some of the unique aspects of the logging industry, one of which is a radio controlled "whistle" system for High-Lead logging typically found in the Pacific Northwest. This form of logging is so dangerous that there are very special State safety laws that **REQUIRE** the use of these unique radio systems.

Another is a "tally system" using computer based voice-recognition software to inventory woodlots and products.

In national forests, on Bureau of Land Management lands and in most state forests all loggers, log truckers and woods personnel are **REQUIRED by LAW** to have access to a **reliable** two-way radio system for the expressed purpose of calling for assistance in the event of an accident or emergency situation and to report forest fires.

# FREQUENCIES

With the exception of three channels in the very-low band VHF range, all FPRS channels are shared with at least one other radio service.

## **27-34 MHz      Very-Low Band VHF**

Nine "Exclusive" channels, others shared with the Special Industrial Radio Service.

## **48-49 MHz      Low Band VHF**

These channels are all shared with the Petroleum Radio Service.

## **72-75 MHz      Mid-Band VHF**

Most often used for fixed service and shared with all Private Land Mobile Radio Services, Common Carriers and other Fixed Services. 20 low power mobile channels shared with the Manufacturing, Railroad, Radio Call Box and Special Industrial Radio Services.

## **150 MHz      High Band VHF**

Shared with the Petroleum Radio Service and the Manufacturing Radio Service. There is some geographic sharing with the Special Industrial Radio Service, the Power Utilities Radio Service, and a few are shared with the Taxi Radio Service. In addition, the FPRS has some VHF channels available on a secondary basis to the Business Paging Service. VHF Telemetry and Data frequencies are shared with Public Safety, Local Government and a wide variety of Industrial Radio and Land Transportation Radio Services. The extent of VHF channel sharing is illustrated by appendix B: VHF Channel Sharing.

## **450-467 MHz      UHF Band**

Six pairs shared with the Petroleum Radio Service, five pairs shared on a limited geographical basis with the Taxi Radio Service and all others shared with Manufacturing, Power Utilities, and Telephone Maintenance Radio Services.

## **800-900 MHz      UHF Band**

Frequencies in the 800-900 MHz UHF Band have not been used very extensively in the forest products industry because of unfavorable propagation in the remote woods areas where the industry has the most critical need for communications.

## UNIQUE PROBLEMS

Radio use in the Forest Products Radio Service presents some unique problems not facing many other radio services. Since logging activities involve the use of heavy equipment in often remote locations and wood products/pulp and paper manufacturing activity employ dangerous machinery, **safety is a vital concern.** The lack of reliable communication can instantaneously result in a very dangerous situation, perhaps damaging equipment or causing a loss of life. Prompt communication in the event of a medical emergency is required by state or federal OSHA rules. **Reliable communication** during forest fire season is also **required** in most states and while on federal forest lands.

The extensive sharing of the radio spectrum with a multitude of other radio services makes the work of the frequency coordinator vital to the licensees and their employees. Although it is impossible to eliminate all possibility of co-channel interference and provide an exclusive frequency for licensees, the coordinator must be sensitive to the vital use of the spectrum by the licensee.

Woodlands and forest related radio systems are frequently located on high mountain tops or mounted on towers up to 400 feet tall specifically to provide **wide area coverage needed** for communications between the remote logging site, truck drivers and crews, offices and mills or wood yards. It is not unusual for a logging crew to work 30 or 40 miles from the nearest town or for a log truck to travel over 100 miles one way for a load of logs. Effective communication over wide areas is vital and is best served by Low Band and High Band systems, often requiring an effective radiated power (ERP) in excess of 250 watts.

Cost effective, instantly available communications is **not otherwise available** by "public" systems such as common carrier or cellular systems. Propagation characteristics of the 48/49 MHz and 150/170 MHz bands generally favor long range communication over rugged terrain. Limited mountain top sites or tall towers often require extensive development and investments. Often systems must be relocated and relicensed at new sites as job conditions and logging activity change. As a result, these vital privately operated communication systems stand alone, and are expensive to operate.

# **FOREST INDUSTRIES TELECOMMUNICATIONS**

FIT is a trade association of the forest products industry and is the FCC certified frequency coordinator for the Forest Products Radio Service. We have been assisting two-way radio applicants and licensees since 1947. As one of the first established frequency coordinators, FIT has been in the forefront of frequency coordination and radio system design. FIT was one of the first to develop a computer database for the efficient and effective management of land mobile radio frequencies. Many of the engineering and assistance services now offered by frequency coordinators and spectrum managers are modeled after the services initiated by FIT over 30 years ago.

As a trade association, FIT represents forest products radio users before the FCC as well as before Congress and other federal agencies on land mobile communications issues. FIT also assists members and other applicants with FCC license applications for a wide variety of other land mobile, microwave, aeronautical and marine licenses. The expertise of FIT staff is unparalleled in the industry with a stable, experienced, and well trained spectrum management staff capable of handling a wide variety of FCC licensing and spectrum matters.

The FIT staff, located in Eugene, Oregon, provides the mechanics of day-to-day operation. Activities include frequency coordination, FCC liaison and licensing assistance. In a typical year FIT will add 200-300 new licensees to the rolls and will handle nearly 10,000 interservice frequency coordinations which involve license record searching to avoid creating harmful interference to existing and planned radio systems.

FIT is a lean and efficient organization that operates through volunteer divisional committees, a Board of Directors and a small staff. The directors establish policy, goals and operating budget and provide overall governance of the organization.

As FCC Rules and policy change, FIT has, and intends to continue to maintain its role in spectrum management and adopt new means to ensure the best possible service to members and clients.

# MAJOR CONCERNS

## GENERAL:

The forest products industry must continue to be permitted to operate **privately owned**, specially designed land mobile communication systems.

Interference-free communications are required because of safety requirements. Communication **channels must be available** to meet State and Federal OSHA requirements, USFS/BLM and State forestry acts.

Radio frequencies must continue to be available to the industry for its critical and **wide area** mobile communication requirements.

## REFARMING ISSUES:

The forest products industry supports the Commission's decision in the Second Report and Order to **increase capacity** of the land mobile spectrum through narrow banding and **increased use of digital technology**.

Supports LMCC's and Motorola's recommendations that the Commission **establish specific dates** for converting to new technology. FIT has recommended further to the Commission that by 2005, new and old systems should be converted to 7.5 and 6.25 kHz narrow band, rather than to 12.5 kHz as the LMCC has proposed.

FIT also believes that:

**Auctions** are not practical in the private land mobile services shared frequency environment.

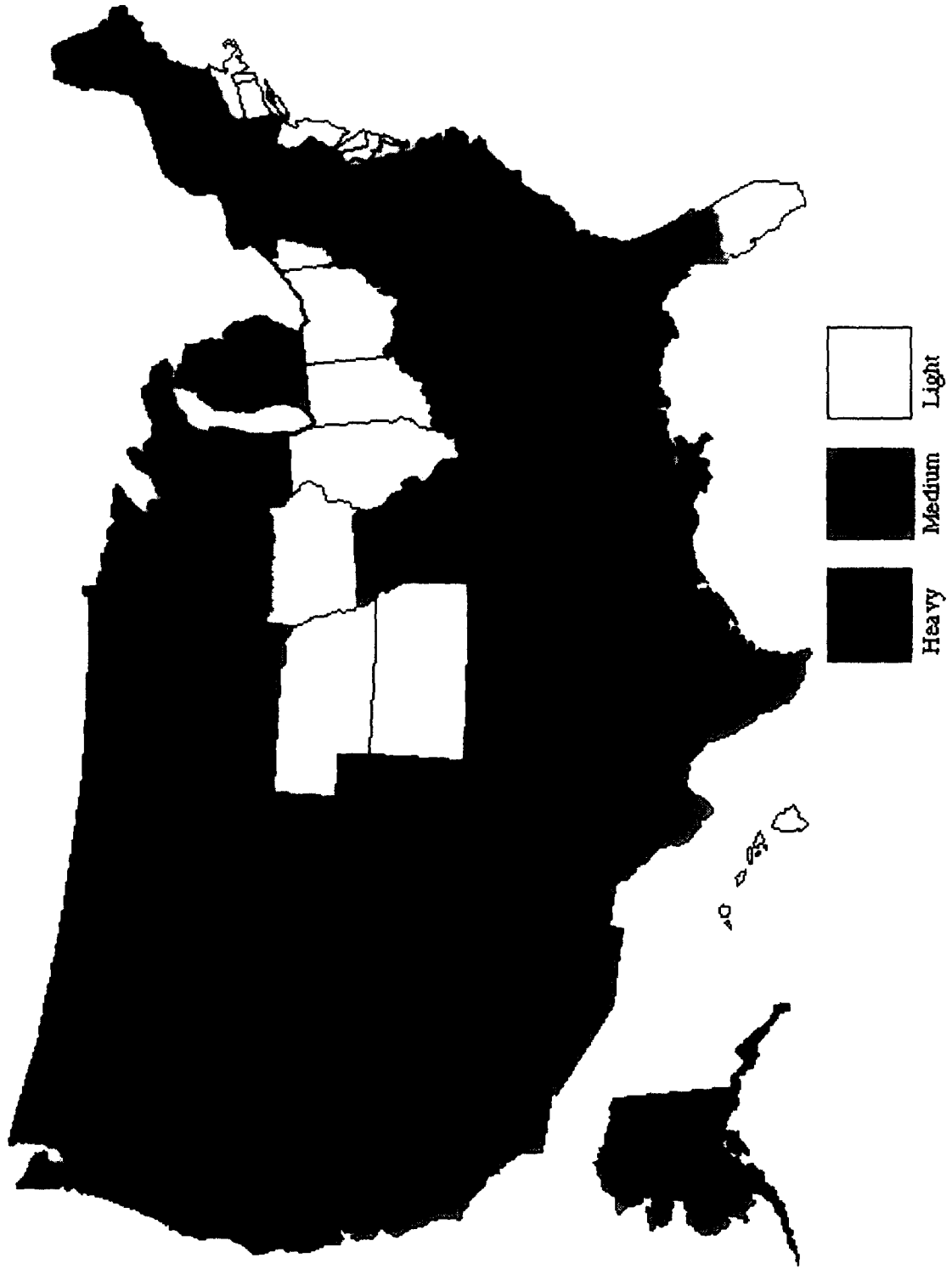
**Industry** would support legislation for reasonable user fees for land mobile radio spectrum.

**Spectrum** below 470 MHz should be retained for private land mobile radio systems.

**FIT strongly believes** that the current land mobile service frequency coordination system works very well and should be retained. As an alternate, FIT has recommended to the Commission the adoption of a four pool plan and consolidation of pools as offered by the Coalition of Industrial and Land Transportation Users. It is vital that all coordinators within any consolidated pool coordinate from the same license data base.

## Appendix "A"

### FOREST PRODUCTS RADIO SERVICE USE



## Appendix "A"

# VHF Channel Sharing

## LAND MOBILE "VOICE" COMMUNICATIONS CHANNELS

Number of channels and the relationship of sharing between the industrial radio services

